

IN THE UNITED STATES DISTRICT COURT  
FOR THE DISTRICT OF MARYLAND

FILED  
U.S. DISTRICT COURT  
DISTRICT OF MARYLAND

2019 JUL 25 A 11:21

UNITED STATES OF AMERICA

v.

JAMES JUNIOR ALIYU,  
KOSI GOODNESS SIMON-EBO, and  
HENRY ONYEDIKACHI ECHEFU,

Defendants

CRIMINAL NO. PWG-19-310

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**MOTION TO UNSEAL INDICTMENT AND ARREST WARRANTS**  
**FOR LIMITED PURPOSE**

The United States of America, by and through undersigned counsel, moves for entry of an Order unsealing the Indictment for the limited purpose of permitting the government to disclose the Indictment and arrest warrants to government personnel, including personnel of a foreign government, as necessary to assist in the apprehension and extradition of the defendants to the United States. In support of its motion, the Government states:

1. On or about June 24, 2019, a federal grand jury sitting in the District of Maryland returned a seven-count Indictment charging the above-captioned defendants with conspiracy to commit wire fraud, in violation of 18 U.S.C. § 1349; conspiracy to commit money laundering, in violation of 18 U.S.C. § 1956(h); money laundering, in violation of 18 U.S.C. § 1956(a) (ALIYU only); and wire fraud, in violation of 18 U.S.C. § 1343.
2. Defendants Aliyu and Echefu are currently located in South Africa. Defendant Simon-Ebo is currently located in Canada.
3. Extradition proceedings for all three defendants have commenced.

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4. To protect the Government's ongoing investigation, the Indictment in this case remains sealed.

5. As a condition of extradition, the Government is required to unseal the Indictment for purposes of providing it to government officials, including South African and Canadian officials.

6. Accordingly, the Government respectfully requests entry of the attached proposed Order so that it may secure the extradition of the above-captioned defendants.

Respectfully Submitted,

Robert K. Hur  
United States Attorney

By: Kelly O. Hayes  
Kelly O. Hayes  
Assistant United States Attorney